

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WILLIAM NORTON,
Plaintiff,

v.

TOWN OF WHITMAN,
JAMES STONE, JR., MATTHEW POORE,
STEPHEN DRASS, PETER AITKEN,
SCOTT BENTON, ANDREW STAFFORD,
JASON H. BATES, and JOHN SCHNYER,
Defendants.

C.A. No. 04-11854 JLT

JOINT STATEMENT

I. STATEMENT OF THE CASE

The plaintiff, William Norton, has brought this case alleging causes of action for civil rights violations, conspiracy, false imprisonment, malicious prosecution, negligence and intentional infliction of emotional distress arising from the plaintiff's arrest by Town of Whitman police officers on or about June 5, 2004 on charges of possession of stolen property in violation of M.G.L. c. 266, § 60A. The defendants deny all such allegations and assert that there was probable cause for the plaintiff's arrest.

II. JOINT DISCOVERY PLAN

The attorneys for the parties have reached an agreement for a proposed Pretrial Schedule as follows:

1. All discovery shall be completed by September 14, 2005.
2. All experts for the plaintiff shall be designated no later than October 12, 2005 pursuant to 26(9)(2)(B).
3. All experts for the defendant shall be designated no later than November 30, 2005.
4. Rule 36 Requests to be completed by December 8, 2005.
5. All expert depositions shall be completed by December 8, 2005.
6. All Motions for Summary Judgment shall be filed by February 16, 2006.
7. All Oppositions to Motions for Summary Judgment shall be filed by March 29, 2006.

8. A Final Pretrial Conference shall be held on or before April 26, 2006 or other date to be set at the convenience of the Court.

III. JOINT STATEMENT

Attorney for the defendant, John J. O'Brien, Jr., and attorney for the plaintiff, Robert S. Sinsheimer, have conferred concerning the above-stated discovery schedule and expenses.

Counsel for the parties have discussed the informal exchange of discovery to reduce the parties' litigation costs.

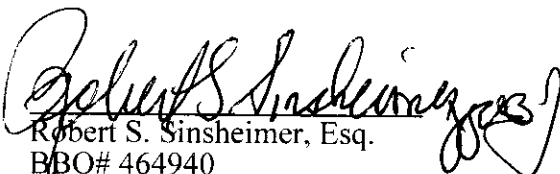
The parties further respectfully suggest that it is premature for the Court to be involved in settlement discussions.

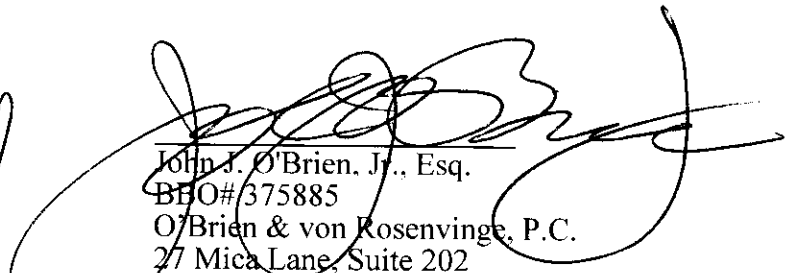
The parties cannot agree at this time to a trial by Magistrate Judge.

Respectfully submitted:

By the plaintiff,
William Norton,
By his attorney,

By the defendants,
By their attorney,


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